IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT COURT OF SOUTH CAROLINA

KIZZY ESTES,) C/A No.: 5:17-00834-RMG
Plaintiffs,)
vs.)
	MOTION FOR RELIEF FROM
CONSUELA FERGUSON, Individually) MEDIATION
And/Or In Her Official Capacity As	
Employee of South Carolina Department)
of Corrections; JEFF SCOTT,)
Individually And/Or In His Official	
Capacity As Employee of South Carolina	
Department of Corrections; MAMIE	
CALLAHAN, Individually And/Or In	
Her Official Capacity As Employee of	
South Carolina Department of	
Corrections; SOUTH CAROLINA)
DEPARTMENT OF CORRECTIONS;	
,	
Defendants.	
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The Plaintiff, Kizzy Estes by and through her undersigned counsel, respectfully moves this Court for an order relieving the Plaintiff from attending mediation, which is currently scheduled for October 4, 2018. Counsel for the Plaintiff has had several direct conversations with counsel for the Defendants regarding her formal demand. This demand was made in good faith and is the lowest to which can be considered for full resolution of this matter. Just today, the Plaintiff learned the Defendants highest, and final, offer is significantly lower than this amount.

Additionally when the Plaintiff made the charges for this brutal rape she was arrested by the Department of Corrections for filing a false charge. Today the Defendants indicated they would not drop these charges, which would preclude a settlement from going forward. As such mediation for this case would serve no useful purpose and would require the Plaintiff to travel approximately

six hours, pay for a mediator, and require the Plaintiff to relive the brutal rape she endured. Thus, good cause exists for the Plaintiff to be relieved from attending and going forward with mediation.

In conclusion, the Plaintiff respectfully requests relief from the mediation requirement in the above captioned matter.

Respectfully submitted,

BELL LEGAL GROUP, LLC

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October 4, 2018 Georgetown, South Carolina